



Pete Solnick <pete@solnicklaw.com>

---

## NeuroMD v. Amazon - Proposed Protective Order

---

Pete Solnick <pete@solnicklaw.com>

Tue, Jan 16, 2024 at 4:30 PM

To: "DeStefano, Michael J" <MDestefano@mofo.com>

Cc: "Gratz, Joseph C." <JGratz@mofo.com>, "Bennett, Allyson R." <ABennett@mofo.com>

See attached. I have not received a date. Now please provide one. Tomorrow I will be moving to compel.

**Peter J. Solnick, Esq.**

**3363 NE 163rd Street, Suite 801**

**North Miami Beach, FL 33160**

**Tel: 786-629-6530**

**Fax: 305-468-6353**

**www.solnicklaw.com**

**Kindly note our change in address. We are now at our NEW OFFICE LOCATION located at 3363 NE 163rd Street, Suite 801, North Miami Beach, FL 33160**

**If visiting, free parking is available on the 3rd and 4th floor.**

[Quoted text hidden]



**11.17.23 email.pdf**

69K



Pete Solnick <pete@solnicklaw.com>

---

## NeuroMD v. Amazon - Proposed Protective Order

---

**Pete Solnick** <pete@solnicklaw.com>

Tue, Jan 16, 2024 at 4:39 PM

To: "DeStefano, Michael J" <MDestefano@mofo.com>

Cc: "Gratz, Joseph C." <JGratz@mofo.com>, "Bennett, Allyson R." <ABennett@mofo.com>

It does not matter. You did not provide dates then or not - just an effort to thwart discovery. And they are not dissimilar. You have 2/3 people who were involved in the keyword ads and organic search, and has knowledge about the documents. So, I do not think it matters very much. I am preparing the motion, and if I do not have dates by the AM, I am filing it. This is enough already!

**Peter J. Solnick, Esq.**

**3363 NE 163rd Street, Suite 801**

**North Miami Beach, FL 33160**

**Tel: [786-629-6530](tel:786-629-6530)**

**Fax: [305-468-6353](tel:305-468-6353)**

**[www.solnicklaw.com](http://www.solnicklaw.com)**

**Kindly note our change in address. We are now at our NEW OFFICE LOCATION located at [3363 NE 163rd Street, Suite 801, North Miami Beach, FL 33160](#)**

**If visiting, free parking is available on the 3rd and 4th floor.**

[Quoted text hidden]